

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SAMIAM GROUP, LLC,  
Plaintiff,

v.

COOPERSBURG ASSOCIATES, INC. dba  
Coopersburg Sports,  
Defendant.

Case No. 22-cv-02256-JFL

**MOTION FOR LEAVE TO FILE  
DOCUMENTS UNDER SEAL**

Pursuant to Local Rule 5.1.2, Plaintiff Samiam Group, LLC hereby moves for leave to file the following documents under seal as part of its January 25, 2023 Motion In Limine to Preclude Defendant From Using Hearsay Exhibits as Evidence:

- Defendant's proposed exhibit D-11 ("Beverage Bat Revenue and Expenses")
- Defendant's proposed exhibit D-16 ("Beverage Bat By Month Summary")
- Defendant's proposed exhibit D-21 ("Levy Letter")

D-11 and D-16 were designated by Defendant as "Confidential - Outside Counsel Eye's Only" pursuant to the Protective Order in this matter (ECF #19). The burden of demonstrating the appropriateness filing these documents under seal rests with the Defendant.

Similarly, D-21 was designated by Plaintiff as "Confidential - Outside Counsel Eye's Only" pursuant to the Protective Order. D-21 was previously filed in connection with another motion and ordered sealed by the Court. *See* ECF #41 (sealing order). It should remain sealed pursuant to the law of the case.

Respectfully submitted,

January 25, 2023

/s/ Jonathan R. Miller, Esq.  
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**CERTIFICATE OF CONCURRENCE**

On January 24, 2023, Mr. Neagle, Defendant's counsel, advised that Defendant concurs with Plaintiff's motion to seal documents produced by Defendant as "Confidential" or "Outside Counsel Eye's Only".

January 25, 2023

/s/ Jonathan R. Miller, Esq.  
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